

# EXHIBIT B



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September 2, 2021

**Via Email:** [bestbibas@gmail.com](mailto:bestbibas@gmail.com)

Mohamed Bibas  
4337 Royce Street NE,  
Columbia Heights, MN 55421

Re: NextGear Capital, Inc.

Dear Mohamed,

As we have discussed, we plan to file a motion to withdraw as counsel on September 9, 2021. Our withdrawal will not have a materially adverse effect as you have settled with NextGear. We will request an extension of time for you to answer this complaint to October 22, 2021

Please be aware that your response to the complaint is currently due September 7, 2021. Also, the settlement agreement may include requirements for you regarding the pending legal action.

We wish you good luck with the resolution of this matter.

Sincerely,

*Nicholas J. Bognanno*

Nicholas J. Bognanno

NJB/ehs

cc: George M. Plews  
Colin E. Connor